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11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION
14

15 **STEVEN RUPP; STEVEN**
16 **DEMBER; CHERYL JOHNSON;**
17 **MICHAEL JONES;**
18 **CHRISTOPHER SEIFERT;**
19 **ALFONSO VALENCIA; TROY**
20 **WILLIS; and CALIFORNIA RIFLE**
21 **& PISTOL ASSOCIATION,**
22 **INCORPORATED,**

Plaintiffs,

v.

22 **ROB BONTA, in his official capacity**
23 **as Attorney General of the State of**
24 **California; and DOES 1-10,**

Defendants.

Case No. 8:17-cv-00746-JLS-JDE

DECLARATION OF JOHN D.
ECHEVERRIA IN SUPPORT OF
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

Date: July 28, 2023
Time: 10:30 a.m.
Courtroom: 8A
Judge: Hon. Josephine L. Staton
Trial Date: None set
Action Filed: April 24, 2017

I, John D. Echeverria, hereby declare and state the following:

1. I am a Deputy Attorney General at the California Department of Justice and serve as counsel to Defendant Rob Bonta, in his official capacity as Attorney General of the State of California (“Defendant”), in the above-titled matter. I make this declaration in support of Defendant’s Motion for Summary Judgement. Unless otherwise stated, I have personal knowledge of the facts set forth herein and am competent to testify thereto.

2. In support of the concurrently filed Motion for Summary Judgment, Defendant relies on Defendant’s Exhibits 1 through 46, filed previously in support of and in opposition to the prior motions for summary judgment. *See* Dkts. 76, 90.

3. Attached hereto are true and accurate copies of the following additional exhibits, which Defendant also relies on in support of the concurrently filed Motion for Summary Judgment:

| Exhibit Number | Document Description | Page Number |
|-----------------------|---|--------------------|
| 47 | Supplemental Expert Report and Declaration of Lucy P. Allen | 1558-1616 |
| 48 | Supplemental Sur-Rebuttal Expert Report and Declaration of Lucy P. Allen | 1617-1635 |
| 49 | Supplemental Expert Report and Declaration of Dennis Baron | 1636-1680 |
| 50 | Supplemental Expert Report and Declaration of Ryan Busse | 1681-1711 |
| 51 | Corrected Supplemental Sur-Rebuttal Expert Report and Declaration of Ryan Busse | 1712-1736 |
| 52 | Supplemental Expert Report and Declaration of Saul Cornell | 1737-1793 |
| 53 | Supplemental Expert Report and Declaration of John J. Donohue | 1794-1839 |
| 54 | Supplemental Expert Report and Declaration of Louis Klarevas | 1840-1945 |
| 55 | Supplemental Sur-Rebuttal Expert Report and Declaration of Louis Klarevas | 1946-1968 |
| 56 | Supplemental Expert Report and Declaration of Brennan Rivas | 1969-1992 |
| 57 | Supplemental Expert Report and Declaration of Randolph Roth | 1993-2066 |

| Exhibit Number | Document Description | Page Number |
|-----------------------|--|--------------------|
| 58 | Supplemental Sur-Rebuttal Expert Report and Declaration of Randolph Roth | 2067-2090 |
| 59 | Supplemental Expert Report and Declaration of Robert Spitzer | 2091-2346 |
| 60 | Supplemental Sur-Rebuttal Expert Report and Declaration of Kevin Sweeny | 2347-2387 |
| 61 | Supplemental Expert Report and Declaration of Colonel (Ret.) Craig Tucker | 2388-2404 |
| 62 | Supplemental Sur-Rebuttal Expert Report and Declaration of Colonel (Ret.) Craig Tucker | 2405-2414 |
| 63 | Supplemental Expert Report and Declaration of Michael Vorenberg | 2415-2486 |
| 64 | Supplemental Sur-Rebuttal Expert Report and Declaration of Michael Vorenberg | 2487-2507 |
| 65 | Advanced Research Projects Agency, Field Test Report, AR-15 Armalite Rifle (1962) | 2508-2563 |
| 66 | U.S. Army, Rifle & Carbine Manual, TC-3-22 (May 2016) | 2564-2816 |
| 67 | R. Blake Stevens & Edward C. Ezell, <i>The Black Rifle: M16 Retrospective</i> (1994) (excerpt) | 2817-2821 |
| 68 | Nick Kirkpatrick et al., <i>What Does an AR-15 Do to a Human Body? A Visual Examination of the Deadly Damage</i> , Wash. Post, Mar. 27, 2023, available at https://tinyurl.com/4vfz4y4b (interactive) (last visited May 25, 2023) | 2822-2832 |
| 69 | Wash. Post Staff, <i>We Spent 7 Months Examining the AR-15's Role in America. Here's What We Learned</i> , Wash. Post, Mar. 27, 2023 | 2833-2836 |
| 70 | Alex Horton, et al., <i>Decades of Marketing Reinvented the AR-15 into a Top-Selling Firearm</i> , Wash. Post, Mar. 27, 2023 | 2837-2861 |
| 71 | Hannah Allam, <i>Armed with AR-15s, Extremist and Militia Groups Anticipate Civil Unrest</i> , Wash. Post, Mar. 27, 2023 | 2862-2873 |
| 72 | Todd C. Frankel, et al., <i>How the AR-15 Became a Powerful Political, Cultural Symbol in America</i> , Wash. Post, Mar. 27, 2023, available at https://tinyurl.com/26tpcmav (interactive) (last visited May 25, 2023) | 2874-2895 |
| 73 | Robert Klemko, <i>As Guns Saturate the United States, Police Turn to the AR-15</i> , Wash. Post, Mar. 27, 2023 | 2896-2906 |

| Exhibit Number | Document Description | Page Number |
|-----------------------|---|--------------------|
| 74 | Sally Buzbee, <i>Why We Are Showing the Impact of Bullets from an AR-15 on the Human Body</i> , Wash. Post, March 27, 2023 | 2907-2909 |
| 75 | Michael Levenson, <i>Parents Were Asked to Give DNA Samples to Help Identify Victims</i> , N.Y. Times, May 25, 2022 | 2910-2911 |
| 76 | Silvia Foster-Frau & Holly Bailey, <i>Sutherland Springs Survivors Haunted by an AR-15's Carnage, Trauma</i> , Wash. Post, Mar. 27, 2023 | 2912-2922 |
| 77 | Alan Feuer, et al., <i>After Texas Mall Shooting, Searching for Motive and Grieving for Children</i> , N.Y. Times, May 8, 2023 | 2923-2926 |
| 78 | Palmetto State Armory, About Palmetto State Armory, https://tinyurl.com/42kt2en3 (last visited May 25, 2023) | 2927-2935 |
| 79 | Chris Linville, <i>AR-15 vs M4: Exploring Key Differences & Similarities</i> , GunsAmericaDigest.com, May 18, 2023, https://tinyurl.com/2p8s5zbt (last visited May 25, 2023) | 2936-2946 |
| 80 | Jack Healy et al., <i>At Least 5 Dead and 25 Injured in Gunman's Rampage at an L.G.B.T.Q. Club in Colorado</i> , N.Y. Times, Nov. 20, 2022 | 2947-2954 |
| 81 | Jeremy White & K.K. Rebecca Lai, <i>What We Know About the Gun Used in the Monterey Park Shooting</i> , N.Y. Times, Jan. 26, 2023 | 2955-2961 |
| 82 | Adeel Hassan & Emily Cochrane, <i>What We Know About the Nashville School Shooting</i> , N.Y. Times, May 20, 2023 | 2962-2969 |
| 83 | Kevin Williams et al., <i>Gunman Who Killed Five in Louisville Left Note and Bought Rifle Legally</i> , N.Y. Times, Apr. 11, 2023 | 2970-2975 |
| 84 | J. David Goodman et al., <i>After Mass Killings in Texas, Frustration but No Action on Guns</i> , N.Y. Times, May 7, 2023 | 2976-2983 |
| 85 | Mem. from Rep. Carolyn B. Maloney to Members of the H.R. Comm. on Oversight & Reform, July 27, 2022 | 2984-3007 |
| 86 | The Violence Project, <i>Key Findings</i> , https://tinyurl.com/bdf4hsay (last visited May 25, 2023) | 3008-3019 |

| Exhibit Number | Document Description | Page Number |
|----------------|--|-------------|
| 87 | Alex Yablon, <i>The Simple Physics that Makes Some Bullets Deadlier than Others</i> , The Trace, June 21, 2017 | 3020-3028 |

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 26, 2023, at San Francisco, California.

/s/ John D. Echeverria

John D. Echeverria
Deputy Attorney General